

Matthew P. Harrington, Esq., State Bar No. 76693

HUGHES & GILL, P.C.

1600 So. Main Street, Suite 315

Walnut Creek, California 94596

Telephone: 925-926-1200

Facsimile: 925-926-1202

Attorneys for Defendant

CENTENNIAL RESTAURANTS LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

CRAIG YATES, an individual; and
DISABILITY RIGHTS, ENFORCEMENT,
EDUCATION, SERVICES: HELPING
YOU HELP OTHERS, a California public
benefit corporation,

Plaintiffs,

vs.

BURGER KING #3157; SYERS
PROPERTIES I LP, a limited partnership
and CENTENNIAL RESTAURANTS LLC,
a limited liability company,

Defendants.

No. C08-00737 JCS

**DEFENDANT CENTENNIAL
RESTAURANTS LLC'S INITIAL
EVIDENTIARY DISCLOSURE**

Defendant Centennial Restaurants LLC, a limited liability company, by and through its attorneys of record, pursuant to Federal Rule of Civil Procedure 26(a), makes the following initial evidentiary disclosures as set forth herein.

Defendant Centennial Restaurants LLC reserves the right to revise, withdraw and/or supplement the disclosures made herein. Further, said disclosures are made without the waiver, intentional or otherwise, of any and all privileges provided by law, including without limitation, the attorney-client privilege and the work product doctrine. Centennial Restaurants LLC

1 reserves the right not to disclose information such to privilege, work product or privacy.
2 Centennial Restaurants LLC reserves all objections as to discoverability, admissibility and/or
3 relevance of any and all documents disclosed pursuant to this initial disclosure.

4 **II. WITNESS/FACTUAL MATTERS:**

- 5 • Joseph Rubin
- 6 • Person Most Knowledgeable for Syers Properties I, LP, a limited partnership
- 7 • Marina Arango
- 8 • Yaneli Arango
- 9 • Velika Avramoska
- 10 • Griselda Azpetia
- 11 • Jose Alfredo Canseco
- 12 • Craig Chrisco
- 13 • Juan F. Cortes
- 14 • Rosario Gelacio
- 15 • David Gomez
- 16 • Ruben Gomez
- 17 • Jorge Lopez
- 18 • Maria Martinez
- 19 • Jessica Mendoza
- 20 • Juan Miranda
- 21 • Goran Riteski
- 22 • Alba Sanchez
- 23 • Farid A. Sanchez
- 24 • Guadalupe Sanchez
- 25 • Raul Sanchez
- 26 • Dakota J. Sousa
- 27 • Michael Stone

- Oscar Torres
- Claudia Vasquez
- Michel Vergara
- Celia Morales Mendoza
- Cesar Rodriguez
- Daniel Salinas
- Sergio Santos
- Rogelio Plascencia

II. UNPRIVILEGED DOCUMENTS SUPPORTING CENTENNIAL RESTAURANTS LLC'S DEFENSE TO PLAINTIFFS' ALLEGATIONS

A. Plans and specifications for the construction of the Burger King restaurant in 1981. The plans and specifications are extremely voluminous and can be obtained either from the City of Petaluma or at the expense of the requesting party from defendant Centennial Restaurants LLC.

CERTIFICATION OF DISCLOSURE

The undersigned, as attorney for defendant Centennial Restaurants LLC certifies to the best of his knowledge, information and belief, after reasonable inquiry, that this disclosure is complete and correct as of the time it was made.

DATED: June 4, 2008

HUGHES & GILL, P.C.

By: 

Matthew P. Harrington
Attorneys for Defendant
Centennial Restaurants, LLC

Yates, et al. v. Burger King #3157, et al.
U.S. District Court No. C08-00737 JCS

PROOF OF SERVICE

I declare that:

I am employed in the County of Contra Costa. On June 5, 2008, I served the following document(s):

DEFENDANT CENTENNIAL RESTAURANTS LLC'S INITIAL EVIDENTIARY DISCLOSURE

____ (by mail) on all parties in said action, in accordance with California Code of Civil Procedure §1013a(3) by placing a true copy thereof enclosed in a sealed envelope in a designated area for outgoing mail, addressed as set forth below. At the Law Offices of Hughes & Gill, mail is placed in that designated area, is given the correct amount of postage and is deposited that same day, in the ordinary course of business, in the United States mailbox in the City of Walnut Creek, California.

____ (by personal delivery) by personally delivering a true copy thereof to the person and at the street address set forth below.

____ (by Federal Express) delivery to all parties, with charges thereon fully prepaid, in a Federal Express collection box, at Walnut Creek, California, and addressed as set forth below.

☒ (by electronic transfer) to all parties (listed below) through the Pacer system. The file transmission was reported as complete and a copy of the court's confirmation will be maintained with the original document(s) in our office. My electronic business address is lsenft@hughes-gill.com.

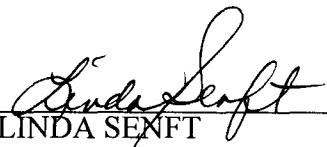
Attys for Pliff

Thomas E. Frankovich, Esq.
2806 Van Ness Ave.
San Francisco, CA 94109
415-674-8600
415-674-9900
tfrankovich@disabilitieslaw.com

Attys for Syers

James Albert Sarraill, Esq.
Sarraig, Lynch & Hall, LLP
700 Airport Blvd., Suite 420
Burlingame, CA 94010
650-685-9200
Fax: 650-685-9206

I declare under penalty of perjury, under the laws of the United States, that the foregoing is true and correct, and that this declaration was executed on June 5, 2008, at Walnut Creek, California.


LINDA SENFT